

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

Case No. 2:22-MD-03042-JRG

JURY TRIAL DEMANDED

THIS DOCUMENT RELATES TO ALL
ACTIONS

JOINT MOTION FOR ENTRY OF THIRD AMENDED DOCKET CONTROL ORDER

Pursuant to the Court’s Second Amended Docket Control Order dated November 14, 2022 (Dkt. 46), the Parties comprising Taasera Licensing LLC (“Taasera”), Quest Patent Research Corporation (“Quest”), Palo Alto Networks Inc. (“Palo Alto”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), Trend Micro, Inc. (“Trend Micro US”), CrowdStrike, Inc. and CrowdStrike Holdings, Inc. (collectively, “CrowdStrike”), Fortinet, Inc. (“Fortinet”), and Musarubra US LLC d/b/a Trellix (“Trellix”) have met and conferred and hereby file this Joint Motion for Entry of Agreed Third Amended Docket Control Order, attached hereto as Exhibit A. The new deadlines proposed by the Parties are summarized in the below chart.

Current Deadline	New Deadline	Description
April 12, 2023	April 17, 2023	Comply with P.R. 4-1 (Exchange Proposed Claim Terms)
February 28, 2023	March 28, 2023	Comply with Standing Order Regarding Subject-Matter Eligibility Contentions ¹
February 28, 2023	March 28, 2023	Comply with P.R. 3-3 & 3-4 (Invalidity Contentions)
January 3, 2023	January 17, 2023	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)

¹ <http://www.txed.uscourts.gov/sites/default/files/judgeFiles/EDTX%20Standing%20Order%20Re%20Subject%20Matter%20Eligibility%20Contentions%20.pdf> [<https://perma.cc/RQN2-YU5P>]

Good cause exists for amending the above deadlines. There are three additional tag-along actions that were recently filed in this District and in the Western District of Texas:

- *Taasera Licensing LLC v. Fortinet Inc.*, C.A. No. 2:22-cv-00415 (E.D. Tex. Oct. 21, 2022)
- *Taasera Licensing LLC v. Musarubra US LLC, D/B/A Trellix*, C.A. No. 2:22-cv-00427-JRG (E.D. Tex. Oct. 31, 2022)
- *Taasera Licensing LLC v. CrowdStrike, Inc. and CrowdStrike Holdings, Inc.*, C.A. No. 6:22-cv-01094 (W.D. Tex. Oct. 21, 2022)

The additional time for these deadlines will allow all parties to this multidistrict litigation (“MDL”) inclusive of the tag-along cases to file responsive pleadings and complete the investigations necessary to do so. The listing of cases in the “Filings in the Master Docket by the Court” section of the Docket Control Order has also been modified to include the new cases in this District that were consolidated into the MDL by the Court.

Dated: December 23, 2022

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

Joseph M. Mercadante

NY Bar No. 4784930

Email: jmercadante@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Justin Kurt Truelove
Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

ATTORNEYS FOR TAASERA LICENSING LLC

/s/ Justin K. Truelove
Mark J. Rosenberg
Email: mrosenberg@tarterkrinsky.com
TARTER KRINSKY & DROGIN LLP
1350 Broadway, 11th Floor
New York, New York 10018
Telephone: (212) 216-8000
Facsimile: (212) 216-8001

Justin Kurt Truelove
Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

***ATTORNEYS FOR QUEST PATENT
RESEARCH CORPORATION***

/s/ Kelly C. Hunsaker (with permission)
Kelly C. Hunsaker
Email: KHunsaker@winston.com
Michael R. Rueckheim
Email: MRueckheim@winston.com
Matthew R. McCullough
Email: MRMcCullough@winston.com
WINSTON & STRAWN LLP
255 Shoreline Drive, Suite 520

Redwood City, CA 94065
Telephone: (650) 858-6500
Facsimile: (650) 858-6550

Krishnan Padmanabhan
Email: KPadmanabhan@winston.com
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700

Vivek V. Krishnan
Email: VKrishnan@winston.com
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Juan Yaquian
Email: JYaquian@winston.com
WINSTON & STRAWN LLP
800 Capital St., Suite 2400
Houston, TX 77002-2925
Telephone: (713) 651-2600
Facsimile: (713) 651-2700c

Melissa R. Smith
State Bar No. 07921800
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

***ATTORNEYS FOR PALO ALTO NETWORKS,
INC.***

/s/ Evan Brewer (with permission)
Eric H. Findlay
Email: efindlay@findlaycraft.com
State Bar No. 00789886
Debby E. Gunter

Email: dgunter@findlaycraft.Com
State Bar No. 24012752
FINDLAY CRAFT, P.C.
102 North College Avenue, Suite 900
Tyler, Texas 75702
Telephone: (903) 534-1100
Facsimile: (903)-534-1137

Clement S. Roberts
Email: croberts@orrick.com
CA State Bar No. 209203
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5700
Facsimile: (415) 773-5759

Alyssa Caridis
Email: acaridis@orrick.com
Jake O'Neal (Admitted *Pro Hac Vice*)
Email: jake.oneal@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017-5855
Telephone: (213) 612-2372
Facsimile: (213) 612-2499

Evan Brewer (Admitted *Pro Hac Vice*)
Email: ebrewer@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
100 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7497
Facsimile: (650) 614-7401

***ATTORNEYS FOR CHECK POINT SOFTWARE
TECHNOLOGIES LTD.***

/s/ Holly Engelmann (with permission)
Melissa R. Smith
State Bar No. 07921800
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Avenue
Marshall, Texas 75670

Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Holly Engelmann
State Bar No. 24040865
Email: HEngelmann@duanemorris.com
DUANE MORRIS LLP
100 Crescent Court, Suite 1200
Dallas, Texas 75201
Telephone: (214) 257-7200
Facsimile: (214) 257-7201

***ATTORNEYS FOR TREND MICRO
INCORPORATED AND TREND MICRO, INC.***

/s/ Irene Yang (with permission)
Irene Yang
Email: irene.yang@sidley.com
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, CA 94104
Telephone: (415) 772-1200
Facsimile: (415) 772-7400

J. Stephen Ravel
State Bar No. 16584975
Email: steve.ravel@khh.com
Kelly Ransom
State Bar No. 24109427
Email: Kelly.ransom@kellyhart.com
KELLY HART & HALLMAN LLP
303 Colorado Street, Suite 2000
Austin, Texas 75201
Telephone: (512) 495-6429
Facsimile: (512) 495-6401

G. Blake Thompson
State Bar No. 24042033
Blake@TheMannFirm.com
J. Mark Mann
State Bar No. 12926150
Mark@TheMannFirm.com
MANN | TINDEL | THOMPSON
201 E. Howard St.
Henderson, Texas 75654

Telephone: (903) 657-8540
Facsimile: (903) 657-6003

***ATTORNEYS FOR CROWDSTRIKE, INC. and
CROWDSTRIKE HOLDINGS, INC.***

/s/ Alice E. Snedeker (with permission)

Melissa R. Smith
State Bar No. 07921800
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Holly Engelmann
State Bar No. 24040865
Email: HEngelmann@duanemorris.com
DUANE MORRIS LLP
100 Crescent Court, Suite 1200
Dallas, Texas 75201
Telephone: (214) 257-7200
Facsimile: (214) 257-7201

Alice E. Snedeker
State Bar No. 151066
Email: aesnedeker@duanemorris.com
Matthew C. Gauder
State Bar No. 287789
Email: mcgaudet@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree Street, NE, Suite 2000
Atlanta, GA 30309-3929
Telephone: (404) 253-6900
Facsimile: (404) 253-6901

ATTORNEYS FOR FORTINET INC.

/s/ Nathaniel St. Clair, II (with permission)

Nathaniel St. Clair, II
State Bar No. 24071564
Email: nstclair@jw.com
Blake T. Dietrich

Texas State Bar No. 24087420

Email: bdietrich@jw.com

Hailey Oestreich

Texas State Bar No. 24116627

Email: hoestreich@jw.com

William T. Nilsson

Texas State Bar No. 24123350

Email: wnilsson@jw.com

JACKSON WALKER LLP

2323 Ross Avenue, Suite 600

Dallas, Texas 75201

Telephone: (214) 953-5948

Facsimile: (214) 661-6848

***ATTORNEY FOR MUSARUBRA US LLC, d/b/a
TRELLIX***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on December 23, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant